

## **Part 70 Permit 9584-01 for SoCalGas**

### **Public Comments and APCD Response to the Comments**

#### **PUBLIC COMMENTS**

##### **(Ref: Following pages)**

- A. Southern California Gas Company \*  
Comments: 1 through 14, sequentially.
- B. Environmental Defense Center  
Comments: Numbered 1-3.
- C. Exxon Company, U.S.A  
Comments: Numbered 1 - 26.
- D. U.S. Environmental Protection Agency, Region IX  
Comments: Numbered 1 - 4

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\* -- SoCalGas received a copy of the draft permit 9584-01 from the APCD via e-mail. In the transmission process, the permit text sometimes overflowed the numbered pages; thus, the page numbers cited by SoCalGas in its comments do not sometimes match the page numbers in the public copy of the draft permit put on display at the APCD lobby. To avoid confusion to the public, the APCD responses refer to the public copy page numbers while the SoCalGas cited page numbers are indicated within parentheses. The same comment on page numbering applies to a couple of Exxon comments.

## **APCD RESPONSE TO COMMENTS:**

### **A. Southern California Gas Company (SoCalGas)**

1. Ref: Section 3.1 (Rule Exemptions Claimed) [p.11(12) of 78]

The “hardcopy version” of the draft permit 9584-01, made available to the public, does not make the statement cited by SoCalGas. Perhaps SoCalGas is referring to an earlier version of the draft, which APCD sent them. The public version of the permit reads: “SoCalGas did not claim broad exclusion from any applicable federal, state or APCD Rules, regulations or standards in its permit application 9584 (Note that, certain emission units at the La Goleta plant are exempt from a number of APCD Rules or Rule provisions; these exemptions are listed elsewhere in this Part 70 permit, as applicable)”

2. Ref: Section 3.1 (Rule Exemptions Claimed) [p. 11(12) of 78]

In response to the SoCalGas request, the APCD staff retrieved the available original NSR permits issued to SoCalGas and kept in the APCD files. These documents consist of the following: PTO 7500/ATC 5704, ATC 9075, ATC 9162, ATC 8946 & ATC 9128. Along with a review of these ATCs, the APCD staff re-visited their May 2, 1997 determination document on SoCalGas 4/21/96 permit shield request. The staff have revised their response to the 4/21/96 permit shield request from SoCalGas. An additional half-a-dozen operating conditions are now designated as environmentally non-significant or federally non-enforceable; also, any administrative conditions listed elsewhere in the permit are deleted as redundant if they are included in Section 9.7 (see detailed APCD response attached; this will replace Table 3.1):

3. Ref. Table 3.2 (APCD Applicable Requirements-Generic) [p. 13(15) of 78]

Rule 309 (Specific Contaminants) applies to IC engines at the La Goleta plant. If it did not, the first paragraph of the Rule would have listed a complete IC engine exemption instead of burying this important exemption in Section G. Section G (CO-Southern Zone) merely exempts South County IC engine CO emissions from this rule. We note that SoCalGas did not raise this issue in June, 1997 when its APCD permits, namely, PTOs 7500, 8946, 9075 and 9162 all listed Rule 309 as applicable to its IC engines. Section E (fuel burning equipment - construction or modification) of Rule 309 does not apply to the existing IC engines at this facility. Therefore, the phrase “All applicable PM/SO<sub>2</sub>/NO<sub>x</sub>/CO emission units” is changed to “All applicable PM/SO<sub>2</sub> emission units.”

4. Ref. Table 3.2 (APCD Applicable Requirements-Generic) [p. 13(15) of 78]

Comment on Rule 323 accepted. The phrase “Emission units needing maintenance and surface coating” is replaced by “Architectural Coatings — used on emission units.”

5. Ref. Table 3.2 (APCD Applicable Requirements-Specific) [p. 13(15) of 78]

Comment on Rule 322 accepted. The phrase “Emission units needing maintenance and surface coating” is replaced by “Metal Surface Coatings — used on emission units.”

6. Ref. Table 3.2 (APCD Applicable Requirements-Specific) [p. 14(16) of 78]

APCD agrees. The SoCalGas stationary source/La Goleta plant is a “major” source; thus, Rule 370 (Potential to Emit), like the APCD’s exemptionary Rule 202, is applicable (i.e., can apply). However, it does not apply at this time; so, the provision is deleted.

7. Ref. Sec. 4.3 (Compliance Assurance Monitoring) [p. 18(18) of 78]

APCD disagrees. All **major** sources are subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) Rule, as promulgated. The CAM rule would specify the requirements of compliance monitoring for each source category. Part 64 may or may not specify any additional monitoring for the source-category comprising the La Goleta source. If it does, the Part 70 permit for this source will have to be re-opened and revised. However, in response to comments elsewhere (see comment C.10 and the APCD response), the phrase “proposed rule” will be changed to “promulgated rule.”

8. Ref. Table 9.1.2 & Permit condition 9.1.A.2 [p. 28(28) of 78]

Comment noted. SoCalGas is encouraged to consult the APCD Policy & Procedures, Regulatory Compliance Manual, Section IV (Nuisance) as it applies to this suggestion. This document, available to the public, comprehensively defines what the APCD considers violations of APCD Rule 303 (Nuisance), e.g., receipt of five or more complaints within a 24-hour period attributed to a specific source followed by a verification investigation on-site by the APCD staff leading to a finding of “nuisance.”

9. Ref. Table 9.1.2 [p. 28(28) of 78]

In response to SoCalGas comments, we note that while firing IC engines with natural gas can ensure compliance with a particulate **mass emission** limit of 0.1 gr./dscf. However, the APCD does not have available data to indicate that the same firing will automatically ensure compliance with **visible emissions** limits. Note that a “visible emissions limit” is defined in terms of shades of darkness and in terms of opacity which obscures an **observer’s** view to a degree equal to or greater than these shades of darkness. Also note that if an IC engine is not maintained well, it can produce plumes with non-compliant opacity. Finally, high opacity is an indicator of poor combustion; thus, it can be associated with higher levels of VOC and consequently greater emissions of hazardous air pollutants.

However, we note that California APCDs, particularly SCAQMD, have recently concluded that natural gas-fired, tuned-up IC engines automatically meet opacity limits; thus, these engines do not need additional compliance monitoring provisions in the permits. We also note that the latest USEPA data (6/97) for natural gas-fired, “clean burn” IC engines show much lower HAP emissions than USEPA’s previous (12/95) estimates.

Therefore, the APCD agrees that “compliance with this condition (*the APCD’s 20 percent*

*opacity limit*) is automatically met as long as : (i) the IC engines are fired with natural gas (uncontrolled PM<sub>10</sub> emission factor equivalent to 0.007 gr/dscf); and, (ii) the engines and their control devices (if any) are performing their normal, designed functions and are being operated according to standard procedures.” (See also APCD’s response to comment B-1).

10. Ref. Section 9.1.A.4 [p. 29(32) of 78]

Comment accepted. The parenthetical comment at the end of paragraphs A and B of this section “[i.e., containing less than 12 ppmv of H<sub>2</sub>S]” will now read “[ i.e., PUC quality natural gas]” in conformance with Section 9.1.B.(2)(a)(1). We note that the PUC quality natural gas has less than 4 ppmv H<sub>2</sub>S, per PUC General Order 58-A.

11. Ref. Table 9.1.3 [p. 30-32 (33-37) of 78]

Comment accepted. APCD will delete the “daily” emission limits. However, consistent with APCD policy, the mass emission limits in the APCD permits will be converted from “hourly” to “daily” basis, if applicable, at the next NSR modification or permit re-evaluation, whichever occurs earlier.

12. Ref. Table 9.1.3 [p. 30-32 (33-37) of 78]

Comment accepted. APCD will correct “PTO 7500” to “PTO 9075.”

13. Ref. Table 9.1.3 [p. 30-32 (33-37) of 78]

The “hardcopy version” of the draft permit 9584-01, made available to the public, does not show the numbers cited by SoCalGas. The public version shows the cited SO<sub>2</sub> limits to be 0.02 lb./hr and 0.08 ton/yr. for IC engine #9. Perhaps SoCalGas is referring to an earlier version of the Table 9.1.3, which APCD sent them.

APCD staff re-checked **all** listed pollutant emission limits against existing (i.e., per APCD permits issued in 6/97) limits for the pollutants. All typographical errors in the Part 70 permit were corrected.

14. Ref. Table 9.1.4 [p. 40 (45) of 78]

The “fuel analysis” listed in Table 9.1.4 refers to “fuel ultimate analysis,” and not to fuel sulfur analysis. This analysis is required for F-factor calculation per USEPA Method 19.

15. Ref. Table 9.1.4 [p.41 (45) of 78]

Comment accepted. APCD will correct the typographical error from “x” to “NO<sub>x</sub>.”

16. Ref. Table 9.2.1 [p.49 (56) of 78]

Comment accepted. Table 9.2.1 will be revised to indicate Rule 326 applicability to flotation cells.

## B. Environmental Defense Center (EDC)

1. Hazardous Air Pollutants — In response to the EDC comments, the APCD staff re-visited its files in search of an appropriate HAP emission factor for IC engine #9. Apart from the USEPA's AP-42 (November, 1995) [rating E] and the CATEF (April, 1994) [unrated] listed data, formaldehyde emission factors for IC engines were found from source tests carried out during the 1990-91 period. A number of these tests were conducted in Santa Barbara County under an AB-2588 initiative by the Western States Petroleum Association (WSPA), while the Ventura APCD staff obtained another set of data. Thus, two more sets of data are available. The Santa Barbara County data file lists a single test (3 runs) on a lean-burn engine (> 1000 hp) which provides an emission factor of 1.4 E-03 lb/MMBtu (with a rating of "E" most likely). Ventura APCD data for similar (?) IC engines provide a formaldehyde emission factor of 3.90 E+01 lb/MMscf of gas burned. None of these emission factors are highly rated.

However, the latest USEPA AP-42 data published in 6/97 are based on a large number of samples. These data recommend a formaldehyde emission factor of 4.1 E+01 lb/MMscf of gas burned (rating A) for clean-burn IC engines. Based on the large sample number and the quality of emission factor data, the APCD staff agrees to use the latest 6/97 AP-42 emission factor. Table 4.2.1 is revised to indicate a potential formaldehyde emission of 1.70 tons/year from IC engine #9 compared to the 14.14 tons/year, based on the 12/95 EPA emission factor noted by the APCD and the EDC.

2. Visible Emissions — The APCD staff shares EDC's concerns regarding the visible emissions from the IC engines (see our detailed comments in A-10 concerning opacity limits compliance). However, recent determinations by SCAQMD and other Southern California APCDs indicate visible emissions from natural gas-fired and well-tuned IC engines to be insignificant (i.e., well below the 20 percent opacity limits, always). Thus, permit condition 9.1.A.(3)(a) for IC engines is revised to read: "compliance with this condition (*the APCD's 20 percent opacity limit*) is automatically met as long as : (i) the IC engines are fired with natural gas (uncontrolled PM<sub>10</sub> emission factor equivalent to 0.007 gr/dscf): and, (ii) the engines and their control devices (if any) are performing their normal, designed functions and are being operated according to standard procedures." Note that the second condition is already included in this permit as an operating limit for the IC engines.

However, the APCD staff disagrees with the EDC comments that a natural gas-fired boiler may emit a plume that would violate the opacity standard. Because of a relatively longer combustion time (thus better combustion) inside a boiler, VOC (soot) and HAP emissions from natural gas-fired boilers are orders of magnitude lower than similar emissions from IC engines. In addition, the APCD Rule 342 requires SoCalGas to keep these boilers tuned up to reduce VOC/NO<sub>x</sub> emissions. In view of these existing measures, any ambient VOC/HAP impact would be negligible; thus, the APCD staff does not plan to change the opacity permit condition 9.3.A.3 for the boilers. We note that similar considerations have prevailed in (a) the nationally-acclaimed Part 70 permit ( # 34-2681) issued to the Intel Company by the State of Oregon DEQ and approved by the USEPA and (b) the recent

Part 70 permits issued by the Bay Area Air Quality Maintenance District (BAAQMD) and approved by the USEPA.

3. Permit Shield — In response to the EDC comments as well as comments elsewhere (see comments A.2 and C.5 and the APCD response), the APCD staff re-visited the SoCalGas Permit Shield request and the past NSR permits issued to SoCalGas. Based on a second and closer review, some of the **administrative** permit conditions included in the PTOs 7500, 8008 and 8166 have been transferred to Part 70 permit Section 9.7.A (Administrative Permit Conditions). A couple of federally-unenforceable operating limits have been shifted to Section 9.7.B (APCD-only enforceable section). For our detailed finding, please refer to the new Table 3.1 and to the Appendix to this APCD response document (also see APCD responses to comments A.2 and C.5). Please note that all conditions that protect the integrity of emission limits or emission reduction credits and ensure smoother compliance monitoring have been retained as federally enforceable.

**C. Exxon Company, U.S.A**

1. Ref. Section 1.1 [*p. 7(7) of 78*]

Clarification of the statement: “All conditions in Section 9 of this permit are federally enforceable and enforceable by the public, except the conditions listed in Section 9.7.B as “APCD-only enforceable.”

(a) This statement does not imply anything about any statements, descriptions or references made in the other sections of this permit. Those entities, where applicable, are covered under Section 9.7.A.(10) [*Compliance*] of the permit.

(b) If any statement, description or reference made elsewhere in the permit is found to be necessary for practicable enforcement (including terms clarification) of the permit and, as such, needs to be specifically included in Section 9 of the permit, this permit will be re-opened and revised accordingly, per APCD Rule 1304.D.9.c.

(c) APCD permits included in Section 10.1 Appendix 1, remain APCD-enforceable. All federally-enforceable conditions found in these permits have been re-listed in Section 9.1 through 9.5, and all “only APCD-enforceable” conditions re-listed in Section 9.7.B, per APCD Rule 1303.D.3. If the APCD finds a federally-enforceable condition listed in Section 9.7.B by mistake or not listed in Sections 9.1 - 5 of the permit, the Part 70 permit will be re-opened and revised accordingly, per APCD Rule 1304.D.9.c.

2. Ref. Section 1.1 [*p. 7(7) of 78*]

The second part of the comment is accepted. The phrase “enforceable by the public” will be replaced by the phrase “enforceable by the public under the Clean Air Act.”

3. Ref. Section 1.2 and various paragraphs throughout sections 2 through 9 [*p. 7(7) of 78*]

The APCD fully accepted the guidelines outlined by the USEPA in their White Paper I (July, 1995); and, takes seriously Exxon’s comment about any “incorporation of **entire** applications by reference into permits,” which violates these guidelines.

In keeping with the White Paper I guidance, the APCD allowed major sources **to streamline their Part 70 applications** by (a) not including complete facility descriptions and operating scenarios, and (b) by merely referring to their existing APCD PTOs to describe the equipment and processes. This, in turn, allowed the APCD **to streamline the Part 70 permit** itself by merely citing the existing APCD permits for informational data and omitting a lot of facility and process descriptions in the permit itself. In the same spirit, the APCD has refrained from referring to any operating scenarios or process descriptions included in the SoCalGas permit application, whenever the APCD defined or clarified applicable requirements or when it listed the permit conditions for SoCalGas.

Thus, the APCD will appreciate if Exxon will point out specific instances where this policy/procedure has been violated in the draft permit. The APCD will rectify those specific situations.

The APCD staff wants to draw Exxon's attention to the White Paper I (July 1995) statement, which immediately follows the White Paper paragraph cited by Exxon: *"If States (APCDs) do incorporate Part 70 applications by reference, EPA will consider information in the application to be federally enforceable only to the extent it is needed to make other necessary terms and conditions enforceable from a practical standpoint."* The APCD will follow this guideline explicitly (see also our comments in C.1 above).

4. Ref. Section 2.1 - 2.4 [p.10 (10) of 78]

Comment accepted. The APCD will include a general statement: "Periodic startup, shutdowns and malfunctions may occur" in Section 2.4 (Other processes).

5. Ref. Section 3 [p.10 (10) of 78]

The APCD disagrees with Exxon's suggestion to include a permit shield section "listing all non-applicable requirements." This is based on the following reasons:

(a) First, SoCalGas did not request any "general listing of all non-applicable requirements" for its stationary source in its permit shield request.

(b) Next, the APCD Rule 1303.E.4 requires permit shield to be sought for specific emission units and technical/administrative reasons provided in advance in seeking each specific shield. SoCalGas followed the APCD Rules in seeking specific permit shields which were granted, where feasible.

(c) In providing a permit shield, the following procedures apply: **Either**, (1) all applicable requirements are included and specifically identified in the permit, **or**, (2) The APCD has, prior to the permit issuance, determined in writing that other requirements have been specifically identified as not applicable to the source and the APCD has included a copy of the determination or a summary thereof as a part of the permit — obviously a resource-intensive process. This procedure is explicitly stated in CAAA, Section 504(f), 40 CFR Part 70.6(f)(1) and APCD Rule 1303.E.4.a. None of these mandates require that both applicable and non-applicable requirements be automatically listed in a Part 70 permit — since this step would significantly increase the workload for each permit.

(d) Exxon's citation of Federal Register, Vol. 57, No. 140, dated July 21, 1992, page 32277, third column, paragraph 1 has been interpreted altogether differently at CAPCOA/ARB workshops. Workshop participants interpreted this paragraph to mean that "if a requirement does apply to a source and is mentioned in the permit as such, the source can still be shielded against that requirement **by a finding** from the permitting authority (APCD or USEPA) that the requirement is not applicable." An example would be an NSPS provision applying to a source; but the APCD making a determination that the provision is not applicable because a corresponding APCD Rule which is more stringent than the NSPS provisions applies to the source. In this case, the APCD Rule takes over and the NSPS provisions are subsumed (overridden). This situation has been discussed in more detail in EPA's White Papers. Obviously, the USEPA and the public must agree to such findings and overrides during the public review of the permit. Thus, *different agencies interpret this citation differently*.

(e) Exxon recommends that the APCD follow the BAAQMD's lead in making such determinations of "non-applicable requirements" a routine procedure in permitting. As stated earlier, any such determination or finding requires considerable expenditure of resources by the APCD (also must be triggered by a request from the permittee, per APCD Rule 1303.E.4). We note that the BAAQMD's Part 70 program is amply funded by their Part 70 sources so that their larger Part 70 staff is geared to provide the Exxon-suggested additional service without any additional costs to the program. The situation is totally different in Santa Barbara where the APCD's Part 70 program staff is limited. Thus, the APCD does not plan to carry out any non-mandated, out-of-scope work unless it is specifically requested by the Part 70 source to do so.

6. Ref. Section 3 [*p.10 (10) of 78*]

Please refer to our response C.5 above regarding permit shields. We note that SoCalGas is not subject to any NSPS provisions at this time including 40 CFR 60.8 (see discussions in Section 3.2); nor does the permit contain any conditions preventing SoCalGas from seeking any protections offered by APCD Rules 505 and 1303.F. In fact, Table 3.2 indicates that Rules 505 and 1301 (Emergency def.) apply to SoCalGas.

7. Ref. Section 3.4 [*p. 13(13) of 78*]

APCD Rule 506 is not a federally-enforceable requirement. The APCD will honor any variances or abatement orders obtained by a source under Rule 506. However, the USEPA or the public can sue a Part 70 source for non-compliance with applicable requirements while the source is operating under an APCD variance from an applicable requirement. Most APCDs in California including Santa Barbara APCD have stated so at their workshops and will include this cautionary note in any variance granted to any Part 70 permittee. The USEPA and CAPCOA are currently trying to resolve this complex issue through an innovative mechanism. The APCD will inform all Part 70 sources immediately if an agreement is reached in this area.

8. Ref. Section 3.4 [*p. 13(13) of 78*]

APCD agrees. The wording here will replace "Rule 1301.F" by "Regulation XIII."



9. Ref. Section 3.4 [p. 14(14) of 78]

APCD agrees. The sentence “That compliance statement is a part of this permit [see Permit Condition 9.7.A.(3)(a)]” will be replaced by “That compliance plan becomes a part of this permit [see Permit Condition 9.7.A.(3)(a) { *Compliance Plan* }].”

10. Ref. Section 4.3, Line 2 [p. 18(18) of 78]

APCD agrees. The word “proposed” will be replaced by “promulgated.”

11. Ref. Section 5.2 [p. 19(19) of 78]

In response to Exxon’s question about the significance of the NEI table 5.2: This informational table is included for historical purposes only. Its data can be used during any Part 70 permit revisions to determine if any applicable requirements, e.g., BACT or LAER, have been triggered by the resultant incremental NEI (exceeding a threshold limit).

12. Ref. Section 5.6 [p. 19(19) of 78]

In response to Exxon’s question about the significance of the federal PTE table 5.5: This informational table is included for historical purposes only. Its data will help the APCD staff to make a determination if the APCD Rule 370 (Potential to Emit -- Part 70 exemption) applies to a Part 70 source.

13. Ref. Section 9.1.B [p. 33(33) of 78]

The APCD agrees partially. The phrase “USEPA-approved” is changed to “USEPA-approvable.” Please note that while Rule 505 is a SIP-approved rule, Rule 505.C.2 allows the extension of a short-term breakdown under emergency variance (Rule 506). Such variances are not recognizable by the USEPA (and the public) at this time. The word “approvable” would overcome this problem.

14. Ref. Section 9.1.B [p. 33(33) of 78]

The statement “ The limits in Table 9.1 do not supersede any other limits ... specified by the USEPA or the APCD during the life of this permit” means that if the APCD or the USEPA adopts a rule within the next five years specifying more stringent emission limits for the SoCalGas IC engines, then the new limits will take over and the Table 9.1.3 limits will **not** prevail. This is a mandatory Part 70 compliance requirement.

15. Ref. Section 9.1.B [p. 34(34) of 78]

Exxon’s suggestion is noted. This condition reflects an existing SoCalGas permit condition for the IC engines. We believe that SoCalGas does not agree to Exxon’s suggested change, since SoCalGas reviewed this condition in 6/97 and accepted it.

16. Ref. Section 9.1.B and various other sections in 2 - 9 [p. 34(34) of 78]

We agree with Exxon's comments that procedural changes in any administratively-approved plans do not trigger permit revisions unless they relax any monitoring, recordkeeping or reporting requirements. The APCD has followed this policy in the past and will continue to do so, based on Part 70 guidance received from the USEPA.

17. Ref. Section 9.1.B [p. 36(34) of 78]

Exxon's suggestion is noted. This condition reflects an existing SoCalGas permit condition for the IC engines. We believe that SoCalGas does not agree to Exxon's suggested change, since SoCalGas reviewed this condition in 6/97 and accepted it.

18. Ref. Section 9.1.B.2.(c)(8) [p. 36(34) of 78]

Exxon's suggestion is noted. This condition reflects an existing SoCalGas permit condition offering ERCs for the IC engines. We note that SoCalGas reviewed this condition in 6/97. Based on their input, the APCD is reviewing the federal enforceability of this condition. (see also the APCD response A.2)

19. Ref. Section 9.1.B.3.(a) [p. 38(38) of 78]

Exxon's suggestion is noted. This condition reflects an existing SoCalGas permit condition offering ERCs for the IC engines. We note that SoCalGas reviewed this condition in 6/97. Based on their input, the APCD is reviewing the federal enforceability of this condition. (see also the APCD response A.2)

20. Ref. Section 9.7.A.(1)(d) [p. 73(73) of 78]

APCD agrees. Exxon refers to a typo here. "APCD Rule 1302.D.1.k" should read "APCD Rule 1303.D.1.k."

21. Ref. Section 9.7.A.(7) [p. 74(74) of 78]

APCD agrees. The second sentence of this Permit Condition will be revised to read "Failure to reimburse on a timely basis shall be a violation of this permit and of applicable requirements and can result in forfeiture of this permit to operate."

22. Ref. Section 9.7.A.(7), 9.7.A.(8) [p. 75(75) of 78]

APCD disagrees. Both APCD Regulation XIII and the federal Regulation 40 CFR Part 70 apply to all Part 70 sources. For a definition of a Part 70 source, see the APCD Rule 1301 (Definitions) and the federal 40 CFR Part 70.2. Please also refer to APCD Rule 102 which indicates deferral of the Regulation XIII to the federal Rule, wherever so required. Finally, please note that the "permitting authority" for all Part 70 permits are both the APCD and the USEPA.

23. Ref. Section 9.7.A.(8) [p. 75(75) of 78]

Exxon's suggestion is noted. The APCD will retain the current language at this time until the policy requested by Exxon is developed in consultation with the USEPA and the California ARB staff. Please note that the language in Section 9.7.A (8) [*Deviation from Permit Requirements*] was developed by the California ARB's Title V staff and approved by the USEPA, Region IX staff before the text was circulated to the APCDs for adoption.

24. Ref. Section 9.7.A.(10) [p. 75(75) of 78]

Exxon is requested to refer to the second sentence in the APCD Rule 206, which is aimed to protect all applicable rules, regulations and standards through implementation of permit conditions.

25. Ref. Section 9.7.A.(12)(a) [p. 75(75) of 78]

APCD agrees. The typo will be revised and the word "quarter" will be replaced by "reporting period."

26. Ref. Section 9.7.A.(14)(a) [p. 76(76) of 78]

APCD agrees. The third sentence in this condition will reflect the USEPA language in 40 CFR 70.7.(f) as recommended by Exxon. The fourth sentence will be retained however, to clarify the third sentence.

#### **D. U.S. Environmental Protection Agency, Region IX**

1. Ref. Periodic Monitoring for emission limits -- IC engines

This comment was discussed, in detail with the USEPA staff. The draft permit Section 9.1.C.(1) requires annual/biennial source testing for the larger IC engines at La Goleta. The permit also includes Inspection and Maintenance conditions in Section 9.1.C.(2) to ensure quarterly NOx monitoring (using portable analyzers) for all engines subject to APCD Rule 333. Based on these discussions, the USEPA recommended to keep the current periodic monitoring conditions intact. They also recommended that the APCD provide a detailed reference concerning the Rule sections cited at the end of each condition, e.g., Rule 333.E.4 instead of a simple Rule 333 or Rule 333.E citation.

2. Ref.: (a) Dehydration/storage unit emissions

The dehydration/storage equipment are described in detail in the APCD permit 8166 and in the Appendix 10.4 of the Part 70 permit 9584-01. Table 9.2.3 of the Part 70 permit provides permitted VOC emission limits; for all dehydration and storage equipment the limit totals 3.97 lbs/hr and 17.33 lbs/yr. . Table 5.3 of the Part 70 permit summarizes permitted emission limits for all equipment and lists the same permitted VOC emissions of 3.97 lbs/hr and 17.33 tons/yr. from dehy./stor.equipment ID #1 - 48 (refer to APCD PTO 8166 for the numbered equipment).

Table 5.5 of the Part 70 permit summarizes the federal potential to emit for all equipment. Since all VOC emissions from dehy./stor.emission units comprise of "fugitive" emissions

and since no NSPS apply to the dehy./stor.emission units, the federal potential to emit VOC is zero for these units. Thus, Table 5.5 lists zero emissions from equipment ID # 1 - 48 (refer to APCD PTO 8166 for equipment).

Ref.: (b) APCD PTO 9128

This PTO for the sand trap devices installed at the dehy./stor. plant in 1995 was merged with APCD PTO 8166 during the June, 1997 permit reevaluation/consolidation process for PTO 8166. Unfortunately, this PTO merger occurred well after the Part 70 permit application 9584 was submitted by SoCalGas in May, 1996; thus, the May, 1996 permit application included a copy of the PTO 9128 while the 1997 draft Part 70 permit merely includes a copy of the APCD PTO 8166 but omits a copy of the superseded APCD PTO 9128.

A comparison of the old PTO 8166 and the new PTO 8166 will show that the new PTO marks and lists equipment from the old, superseded PTO 9128 and includes all permit conditions specifically marking the pollutant emission limits listed in PTO 9128. The APCD will discuss this merger in Section 1.2 of the Part 70 permit 9584 and remove any unintended confusion. Note that the permitted VOC emission limit in old PTO 9128, re-listed in new PTO 8166, is federally enforceable; however, these consist of fugitive emissions and thus do not count toward the federal potential to emit.

Ref.: (c) APCD PTO 8335 [*same explanation as above*]

This APCD PTO for natural gas odorant and metering unit installed at the gas plant in 1991 was also merged with the APCD PTO 8166 during the June, 1997 permit reevaluation/consolidation process for PTO 8166. Unfortunately, this PTO merger occurred well after the Part 70 permit application 9584 was submitted by SoCalGas in May, 1996; thus, the May, 1996 permit application included a copy of the PTO 8335 while the 1997 draft Part 70 permit merely includes a copy of the APCD PTO 8166 but omits a copy of the superseded APCD PTO 8335.

A comparison of the old PTO 8166 and the new PTO 8166 will show that the new PTO marks and lists equipment from the old, superseded PTO 8335 and includes all permit conditions specifically marking the pollutant emission limits listed in PTO 8335. The APCD will discuss this merger in Section 1.2 of the permit and remove any unintended confusion. Note that the permitted VOC emission limit in old PTO 8335, re-listed in new PTO 8166, is federally enforceable; however, these consist of fugitive emissions and thus do not count toward the federal potential to emit.

3. Ref.: Emissions allowed in PTO 8166 and PTO 6819

Some VOC emission limits listed in the dehydration/storage plant (PTO 8166) and the gasoline refueling station (PTO 6819) emission limit included in the Part 70 permit 9584, Sections 9.2 and 9.5 are APCD-only enforceable. Also, these emissions are fugitive in nature. Finally, no NSPS apply to the equipment listed in the two permits. Thus, the emissions do not count toward the federal potential to emit.

4. Ref.: Reporting requirements

The numbering inconsistencies cited for Sections 9.2 and 9.3 resulted from a late change in numbering system; these have been corrected.